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Attorneys for Counterclaim-Plaintiff and Defendant
MILK MOOVEMENT, INC. and
Defendant MILK MOOVEMENT, LLC

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

EVER.AG, LLC, a Delaware Limited Liability
Company,
Plaintiff,

v.

MILK MOOVEMENT, INC., a foreign
Corporation, and MILK MOOVEMENT,
LLC, a Delaware Limited Liability
Company,

Defendants.

MILK MOOVEMENT, INC., a foreign
Corporation,

Counterclaim-Plaintiff,

v.

EVER.AG, LLC, a Delaware Limited Liability
Company,
Counterclaim-Defendant.

Case No.: 2:21-CV-02233-WBS-AC

**[PROPOSED] ORDER REGARDING
MILK MOOVEMENT'S AND EVER.AG'S
FACT WITNESS DEPOSITIONS AND
PRIVILEGE LOGS**


1 Defendants Milk Moovement, Inc. and Milk Moovement LLC (together, “Milk
2 Moovement”) and Plaintiff Ever.Ag, LLC (“Ever.Ag” and, with Milk Moovement, the “Parties”),
3 filed a Joint Stipulation to Continue Discovery Deadlines on September 28, 2023. After reviewing
4 the submission of counsel, and for good cause shown, this Court hereby GRANTS the Joint
5 Stipulation and ORDERS that:

6 1. The Parties may take depositions of fact witnesses beyond the October 27, 2023 fact
7 discovery deadline, upon agreement of the parties; and

8 2. The Parties shall exchange privilege logs by October 9, 2023, with any challenges to
9 claims of privilege filed by October 18, 2023.

10 **IT IS SO ORDERED.**

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12 Dated: September 29, 2023

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14 ALLISON CLAIRE
15 UNITED STATES MAGISTRATE JUDGE
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